

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>LISA BROWN, M.D.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 05-32 E</b>
	)	
<b>HAMOT MEDICAL CENTER,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT HAMOT MEDICAL CENTER'S RULE 56  
MOTION FOR SUMMARY JUDGMENT**

Defendant Hamot Medical Center ("Hamot"), by and through its undersigned counsel, pursuant to Fed.R.Civ.P. 56, hereby moves for an Order granting judgment as a matter of law to Hamot with respect to any and all claims asserted against Hamot in the Complaint ("Complaint") filed by plaintiff Lisa Brown ("plaintiff").

As support for this Motion, Hamot respectfully refers this Court to the attached Memorandum of Points and Authorities and Concise Statement of Undisputed and Material Facts with accompanying Exhibits in support thereof.

WHEREFORE, Hamot respectfully requests that the Court grant its Motion for Summary Judgment. A proposed Order is attached.

Respectfully submitted,

Tobin O'Connor Ewing & Richard

/s/ Kerry M. Richard

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